

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

VICKY RODRÍGUEZ TORRES, LUIS RAFAEL  
MALDONADO VAILLANT, AND THEIR  
CONYUGAL PARTNERSHIP  
PLAINTIFF,

v.

GOVERNMENT DEVELOPMENT BANK FOR  
PUERTO RICO, JAVIER RAMOS LUIÑA,  
JANE DOE (1), CONJUGAL PARTNERSHIP  
RAMOS-DOE(1), ENID LÓPEZ LÓPEZ, JOHN  
DOE (2), CONJUGAL PARTNERSHIP LÓPEZ-  
DOE (2), ÁNGEL PÉREZ RIVERA, JANE DOE  
(3), CONJUGAL PARTNERSHIP PÉREZ-DOE(3),  
JORGE IRIZARRY HERRANS, JANE DOE (4),  
CONJUGAL PARTNERSHIP IRIZARRY-DOE (4),  
LUIS I. ALFARO MARTÍNEZ, JANE DOE (5),  
CONJUGAL PARTNERSHIP ALFARO-DOE (5),  
MARINE COMAS TORRES, JOHN DOE (6),  
CONJUGAL PARTNERSHIP COMAS-DOE (6),  
NAPHIS TORRES PADRÓ, JOHN DOE (7),  
CONJUGAL PARTNERSHIP TORRES-DOE (7),  
EDGARDO RODRÍGUEZ NIEVES, JANE DOE (8),  
CONJUGAL PARTNERSHIP RODRÍGUEZ-DOE (8),  
AND AMERICAN INTERNATIONAL INSURANCE  
CO. OF PR  
DEFENDANTS.

CIVIL NO. 09-CV-01151-JP

SUBJECT MATTER: TITLE  
VII VIOLATIONS, AGE &  
SEX DISCRIMINATION,  
TORTS

PLAINTIFF DEMANDS TRIAL  
BY JURY

PLAINTIFF'S INFORMATIVE MOTION WITH REFERENCE TO DISCOVERY

TO THE HONORABLE COURT:

Plaintiff VICKY RODRÍGUEZ TORRES, LUIS RAFAEL MALDONADO  
VAILLANT, AND THEIR CONYUGAL PARTNERSHIP (hereinafter,  
Plaintiffs), through the undersigned attorneys, respectfully and  
in compliance with this Courts Initial Scheduling Conference  
Order STATE and PRAY as follows:

1. The Court's Initial Scheduling Conference Order of June 29, 2009, notified on July 14, 2009 ("ISC Order") states in Part V. Preliminary Orders, page 11, that:

"Defendants informed the Court that they already served interrogatories and requests for admissions upon Plaintiffs. Plaintiffs **SHALL** answer **on or before July 13, 2009.**"

2. Plaintiff's notified Defendants with their Response to the Defendant's First Request for Document Production and Request for Admissions through their attorney via electronic mail on July 15, 2009, and through personal delivery service on July 16, 2009.

**WHEREFORE** based on the foregoing it is respectfully requested that the Court considers appearing parties in compliance with the Courts ISC orders from June 29, 2009.

**RESPECTFULLY SUBMITTED.**

**WE HEREBY CERTIFY** that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: **Mariela Rexach Rexach**, PO Box 363128, San Juan, Puerto Rico 00936-3128.

In San Juan, Puerto Rico, this sixteen (16) day of July of 2009.

**LAW OFFICES OF CUADROS & CUADROS**  
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Signed By: ***Olga M. Benítez Quiñones***  
**Olga María Benítez Quiñones**  
**USDC-PR No. 226502**